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Attorneys for Defendant
MV TRADING, INC. dba MV TRADING, CO.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

U.S. FOODSERVICE, INC.,

Plaintiff,

v.

MV TRADING, INC. dba MV TRADING, CO.,

Defendants.

CASE NO. 11 CV 1362 EDL
CORRECTED

**STIPULATION AND ~~[PROPOSED]~~
ORDER EXTENDING TIME TO
RESPOND TO COMPLAINT AND FOR
RELIEF FROM CASE MANAGEMENT
SCHEDULE**

(Civ. L.R. 6-1(a))

Pursuant to Civ. L. R. 6-1(a), Plaintiff U.S. Foodservice, Inc. and Defendant MV Trading, Inc. dba MV Trading, Co., by and through their respective counsel, stipulate and agree as follows:

WHEREAS Plaintiff U.S. Foodservice, Inc. served its Complaint for, *inter alia*, trademark infringement on March 23, 2011;

WHEREAS Defendant MV Trading, Inc. dba MV Trading, Co. currently has until May 26, 2011 to answer or respond to the Complaint;

WHEREAS the parties previously stipulated to a 28-day extension of time for Defendant MV Trading, Inc. dba MV Trading, Co. to respond to Plaintiff's Complaint, from April 14, 2011 to

1 May 12, 2011, and to a 14-day second extension of time from May 12, 2011 through May 26,
2 2011;

3 WHEREAS pursuant to the Order Setting Initial Case Management Conference and ADR
4 Deadlines ("Case Management Order"), June 7, 2011 is the deadline for the parties to meet and
5 confer pursuant to F.R. Civ.P. 26(f) and to either select an ADR process or notify the Court of the
6 need for an ADR phone conference pursuant to Civ. L.R. 16-8 and ADR L.R. 3-5;
7

8 WHEREAS the parties are attempting to amicably resolve the litigation pending between
9 them;

10 IT IS HEREBY STIPULATED AND AGREED that Defendant MV Trading, Inc. dba MV
11 Trading, Co. shall have until June 9, 2011 to answer or otherwise respond to Plaintiff's Complaint.

12 IT IS FURTHER STIPULATED AND AGREED that the parties hereto jointly request that
13 each of the dates in the Case Management Order, including the case management conference, be
14 extended by 30 days.
15

16
17 DATED: May 26, 2011

SCHIFF HARDIN LLP

18
19 By /s/ Sarah D. Youngblood
Sarah D. Youngblood

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21 Attorneys for Plaintiff
U.S. FOODSERVICE, INC.
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1 DATED: May 26, 2011

NARANCIC & KATZMAN, P.C.

2
3 By /s/ Perry J. Narancic

Perry J. Narancic

4 Attorneys for Defendant
5 MV TRADING, INC. dba MV TRADING, CO.

6
7 **DECLARATION OF CONSENT**

8 I, Perry J. Narancic, hereby declare pursuant to General Order 45, §X.B, that I have
9 obtained concurrence in the filing of this Stipulation To Extend Time To Respond To Complaint
10 and for Relief From Case Management Schedule from Sarah D. Youngblood, Esq.

11 I declare under penalty of perjury under the laws of the United States of America that the
12 foregoing is true and correct.

13 Executed this 26th day of May, 2011.

14
15 /s/ Perry J. Narancic

16 **ORDER**

17 Pursuant to stipulation of the parties and good cause appearing,

18 IT IS SO ORDERED.

19 The case management conference in the above-captioned case will be held on

20 August 5, 2011 at 10:30 am.
21 ~~3:00 p.m.~~

22
23 Dated: 5/31/2011

24 United States Magistrate Judge
District